

CORRES. CONTROL

OUTGOING LTR. NO.

DOE ORDER # 4700.1

04-RF-00177

DIST. LTR ENC

DIETER, T.		
FERRERA, D.W.	X	X
FERRI, M.S.		
JINDSAY, D.		
YLE, J.		
MARTINEZ, L. A.		
PARKER, A.		
POWERS, K.		
SHELTON, D.C.	X	X
SPEARS, M.S.		
PRICE, K.D.		
TUOR, N. R.		



AGUILAR, P.		
BEAN, C.		
BUTLER, J. L.		
DECK, C.	X	X
FRANCIS, M.		
REIBOTH, C.		
SEIS, A.		
SIBBS, F.	X	X
UMISTON, T.		
HUNTER, D.		
SNAPP, S.		
JINSINGLER, H.		
MARSHALL, J.R.		
MYERS, K.	X	X
NESTA, S.	X	X
OLIVER, R.		
MAN, K.		
LAPPERT, R.		
ROSE, A.		
CHARDILLA, R.		
ROSENMAN, A.		
NYDER, D.P.		
WARTZ, J.M.		
VIEMELT, K.	X	X

February 11, 2004

04-RF-00177

Joseph Legare
Assistant Manager Environment and Stewardship
DOE, RFPO

MINOR MODIFICATION TO THE RSOP FOR FACILITY DISPOSITION – SMN-011-04

Attached is a draft transmittal letter to the Colorado Department of Public Health and Environment for the minor modification to the *RSOP for Facility Disposition*. The draft transmittal letter has been prepared from DOE RFCA coordinator to CDPHE RFCA coordinator.

Please contact Steve Nesta x6386 with questions or concerns, and when the letter from DOE is sent to CDPHE.

Stephen M. Nesta
Environmental Manager
Remediation, Industrial D&D, and Site Services

CORRES. CONTROL	X	X
DMN RECD/T130G	X	X
RAFFIC		
ATSH30		

Attachment:
As Stated

KLM:pvt

CLASSIFICATION:		
CNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

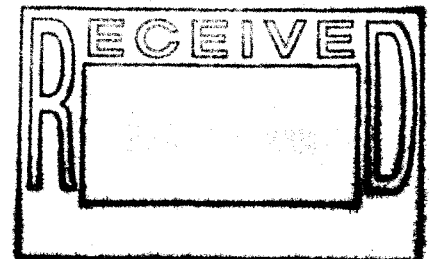
AUTHORIZED CLASSIFIER
SIGNATURE:
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE
REPLY TO RFP CC NO.:

Org. and 1 cc – Joseph Legare

CC:
Gary Morgan

ACTION ITEM STATUS:
☐ PARTIAL/OPEN
☐ CLOSED
LTR APPROVALS:

ORIG. & TYPIST INITIALS:
KLM:pvt



-46469 (Rev. 9/94)

Kaiser-Hill Company, LLC

Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden, CO 80403-8200 • 303-966-7000

IA-A-001971

Steve Gunderson
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

MINOR MODIFICATION TO THE RSOP FOR FACILITY DISPOSITION

Mr. Gunderson:

In accordance with the Rocky Flats Cleanup Agreement (RFCA), a minor modification is being submitted for the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Disposition. This modification addresses bringing the RSOP in line with how RFCA addresses the remediation of the Original Process Waste Lines (OPWL).

In accordance with RFCA Part 10 §125, there is no formal requirement that the LRA approve minor modifications. Therefore the affected pages, which are included, will be incorporated into the RSOP in seven days.

If you have any questions regarding this, please contact me at (303) 966-2282.

Joseph Legare
U.S. Department of Energy

RFCA Standard Operating Protocol for Facility Disposition

RECORD OF MODIFICATIONS

RSOP Modification	Effective Date	Description
1	2/23/2004	Incorporate language to address change in remediating OPWL as changed in RFCA and language to address leaving contaminated structures below three feet of final grade.

- Decommissioning or ER will remove old process waste lines (as defined in appropriate RSOP notification letter) within or as part of the facilities, if the old process waste lines are within 3 feet of final grade, and ensure that any remaining lines below 3 feet of final grade are filled with grout or a grout like material. ~~at the facility perimeter are blocked, and~~ A map will be maintained annotating the locations and depth sources of the process lines. If within the perimeter of a facility, there is a network of old process waste lines below 3 feet of final grade, the consultative process will be used to determine disposition of this portion of the old process waste system.
- ER will assess and be responsible for determining the actions for remediating contaminated soil and associated process waste lines beneath floor slabs.
- If decommissioning activities will occur in an IHSS area, the silt fence or other sediment control mechanism will be located so that potential contamination does not migrate outside of the IHSS area. Sediments that collect at the sediment control point will be addressed by ER during remediation of the associated IHSS.
- Decommissioning will flush and remove sanitary sewer lines, tanks and equipment associated with facilities to the isolation valve of the main system line. The flushing conducted by Decommissioning will consist of flushing the system with clean water.
- In general, Decommissioning will remove any structural material within 3 feet of proposed final grade. This will include facility slabs and foundations unless otherwise required by ER based on remediation requirements.
- Decommissioning or ER will remove any structures below 3 feet of the proposed final grade when the structure prevents access to underlying soil that requires remediation, or when the structure cannot be unrestricted released. The removal will include the foundation and at least three feet of the footings/pilings. Any remaining footings/pilings will be assessed and may be removed during ER activities.
- If ER encounters additional UBC after decommissioning removes contaminated structures below 3 feet of proposed final grade, ER will remove the additional structure as necessary to complete the remediation.
- The Site Water Balance Study will assess groundwater dynamics at Site closure, including the effect of subsurface structures left in place (e.g., utility and pipeline corridors, building slabs/foundation and drains). ER will address the subsurface effects as a component of the final configuration of the Industrial Area to protect surface water. ER will evaluate the Industrial Area groundwater plume and remediate it, as appropriate.
- In the event that decommissioning of a facility with a high potential for UBC occurs well before scheduled soil remedial actions, ER may specify that facility slabs be left in place to provide continued containment on probable contaminated soil. This decision will be made on a case-by-case basis and will be documented in writing with concurrence from both groups and will be included in the project administrative record. The requirements for leaving the slab in place will be addressed by ER.
- In the event that a time gap occurs between the decommissioning and ER phases as described above, the ~~Site's landlord organization~~ D&D Project management will provide surveillance and maintenance of the facility slab during the interim. The hand-off from decommissioning

to ER the ~~landlord organization~~ will be documented in writing between decommissioning, ER and the ~~landlord organization~~.

- Tunnels and other underground structures will be dispositioned on a case-by-case basis. In general, the dispositioning will be conducted during decommissioning. However, the decision on the dispositioning of these structures will be identified in the Project Management Plans.
- ER will be responsible for the removal of sidewalks, driveways, and roads outside the facility footprint.
- If the dispositioning of a facility involves groundwater intrusion, sampling will be conducted by ER in accordance with the Integrated Monitoring Program (IMP) to determine if the groundwater is contaminated. If the groundwater is contaminated, an assessment will be made by ER in coordination with the IMP to determine if the groundwater could impact surface water. If the water is contaminated, but there is no threat to surface water protection standards, the groundwater will be left in the subsurface structure with appropriate controls to protect the health and safety of workers and the public until remediation by ER. If the water is contaminated and is a threat to surface water protection standards, the water will be pumped to a treatment facility until remediated by ER, if required. Table 2 provides some potential scenarios with respect to groundwater and surface water actions during decommissioning. This table is an example of potential conditions and actions to be taken. Project-specific controls will be detailed in the Demolition Plan and IWCP package for the demolition activity. ER actions, details, and requirements will be detailed in the ER RSOP.

Table 2. Matrix of Groundwater Actions

Condition	Action
Groundwater, surface water, utility water or precipitation is collecting in the excavation or work areas during decommissioning, and it must be managed to ensure safe work areas and protection of the environment.	As required, temporarily manage water as per the Incidental Water Program during decommissioning and/or ER activities.
Prior to decommissioning activities, water is collecting in sumps, vaults, or other below ground structures and pumped to Site treatment facilities.	This water will continue to be collected and treated at Building 374 or other Site facilities as required to protect surface water and to maintain appropriate work environments until decommissioning is completed and/or until ER work is completed as required.
Prior to decommissioning activities, water is collecting in sumps, vaults, or other below ground structures but is not pumped or treated.	Water will not be collected, removed, or treated unless required to protect surface water quality or workers.
There are potential surface water impacts from foundation drains	The pathway to surface water from foundation drains will be removed by ER, either through drain removal, grouting or other effective mechanism unless these are disturbed during decommissioning. In that case, Decommissioning will remove the foundation drains.

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